UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Allan Chiocca,)	
Plaintiff)	
v.)	
The Town of Rockland, Deirdre Hall,)	C.A. No. 1:19-cv-10482-WGY
Edward Kimball, Larry Ryan,)	
Michael Mullen Jr., Michael O'Loughlin,)	
Richard Penney and Kara Nyman,)	
)	
Defendants)	

DECLARATION OF ADAM J. SHAFRAN IN SUPPORT OF PLAINTIFF ALLAN CHIOCCA'S MOTION TO COMPEL DEFENDANTS TO RESPOND TO DISCOVERY

- I, Adam J. Shafran, hereby depose and state under the pains and penalties of perjury:
- 1. I am a person over the age of eighteen (18), am of sound mind, and knowingly and voluntarily execute this declaration in support of Mr. Chiocca's motion to compel.
- 2. If called to testify, I could and would testify to the following based on my personal knowledge and experience.
- 3. I am counsel to Allan Chiocca and, in that role, have knowledge of documents and other information produced by the parties in this matter.
- 4. Attached hereto as Exhibit A is a true and accurate copy of transcript memorializing the Town of Rockland's July 17, 2018 Board of Selectmen meeting.
- 5. Attached hereto as Exhibit B is a true and accurate copy of pages 27 and 29 from the investigation report by Regina Ryan, a full and complete copy of which can be found at Dkt. No. 33-4.

6. Attached hereto as Exhibit C is a true and accurate copy of a document produced

in discovery in this matter, Bates-labeled Kimball000360-000361.

7. Attached hereto as Exhibit D is a true and accurate copy of a document produced

in discovery in this matter, Bates-labeled Kimball000390.

8. Attached hereto as Exhibit E is a true and accurate copy of a document produced in

discovery in this matter, Bates-labeled Kimball000083.

9. Attached hereto as Exhibit F is a true and accurate copy of a statement posted to

the "Committee to Elect Deidre Hall" Facebook page, Bates-labeled AC02123.

10. Attached hereto as Exhibit G is a true and accurate copy of documents produced in

discovery in this matter, Bates-labeled Kimball000367-000371.

11. Attached hereto as Exhibit H is a true and accurate copy of a document produced

in discovery in this matter, Bates-labeled Kimball000410-000411.

I hereby declare under the pains and penalties of perjury that the information herein is true

and accurate to the best of my knowledge and belief.

July 1, 2021 /s/ Adam J. Shafran

Adam J. Shafran

CERTIFICATE OF SERVICE

I, Eric J. Walz, do hereby certify that this document filed through the ECF system shall be sent electronically to the registered participants as identified on the Notice of Electronic Filing on July 1, 2021.

/s/ Eric J. Walz Eric J. Walz